

NS:KDE  
F. #2018R01351

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

19-MJ-36

RAMON SANABRIA,  
also known as “Junior,”

(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

PHILIP KEANE, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

On or about January 16, 2019, within the Eastern District of New York, the defendant RAMON SANABRIA, also known as “Junior,” together with others, did knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved one kilogram or more of a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A); Title 18, United States Code, Sections 2 and 3551 et seq.)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"). I have been an FBI Special Agent for approximately six years and am currently assigned to the New York Metro Safe Streets Task Force. During that time, I have participated in investigations of violent crimes and narcotics offenses and, among other things, have conducted or participated in surveillance, the execution of search warrants, debriefings of informants and reviews of taped conversations, and have participated in investigations that included the interception of wire and electronic communications. Through my training, education and experience, I have become familiar with the manner in which narcotics and firearms crimes, among others, are carried out, and the efforts of persons involved in such activity to avoid detection by law enforcement.

2. The FBI, together with the New York City Police Department ("NYPD"), has been investigating, among others, RAMON SANABRIA, also known as "Junior," ("RAMON") for heroin trafficking. During the course of the investigation, law

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware. The facts in this Complaint come from my personal observations, my training and experience, and information obtained from other law enforcement agents and witnesses. Where a specific recorded conversation is described, it is set forth in draft form and in part and substance. Unless otherwise indicated, interpretations of coded language and statements of my belief concerning the substance of intercepted conversations set forth in this Affidavit are based on my and other investigating agents' training and experience, information learned during the investigation, and the context of the quoted conversations. Further, not all relevant intercepted conversations are described herein. Moreover, for the call excerpted herein, not all relevant portions of the call has been described. Finally, the excerpt of the conversation set forth herein is based upon a draft, not final, transcript prepared by the monitoring agents and is subject to revision.

enforcement agents obtained, among other things, a judicially authorized wiretap for a cellular telephone used by RAMON's brother, who is charged in an indictment filed in United States v. Sanchez, et al., 19-CR-14 (AMD) (E.D.N.Y.) (the "Wiretap"). Interception over the Wiretap revealed, among other things, that RAMON, together with others, processed heroin at his residence, which is located in Queens, New York (the "RAMON Residence"). As one example, on or about December 3, 2018, RAMON was intercepted asking the Relative about mixing "clouds" and "grays," which, based upon my training, experience and involvement in the investigation, I believe refers to mixing heroin with a cutting agent for redistribution.

3. On or about January 3, 2019, the Honorable Peggy Kuo, United States Magistrate Judge for the Eastern District of New York, signed a search warrant authorizing the search of the RAMON Residence. See 19-M-15 (E.D.N.Y.). This warrant was executed earlier today in conjunction with the arrests of the individuals charged in the indictment in United States v. Sanchez.

4. During the course of the search of the RAMON Residence, law enforcement agents searched, among other areas, the second floor of the residence. On the second floor, law enforcement agents recovered, among other things: (1) approximately 8,700 glassine envelopes, each of which was filled with a powdery substance and one of which field-tested positive for the presence of heroin; (2) one package (commonly referred to as a "brick") and four zip-lock bags containing a powdery substance weighing in total over 2.7 kilograms, which, based on my training and experience, I also believe to be heroin; (3) approximately 20 bags containing a powdery substance weighing approximately 460 grams, which based on my training and experience, I also believe to be heroin; (4) a loaded

firearm with a defaced serial number; (5) thousands of unused glassine envelopes; and (6) multiple grinders and sifters, which, based on my training, experience and involvement in the investigation, are paraphernalia commonly used to process heroin for redistribution.

5. In addition, during the course of the search, law enforcement agents arrested RAMON, who lives on the first floor of the RAMON Residence. The other residents of the RAMON Residence were RAMON's wife, RAMON's mother and children. Accordingly, given RAMON's participation in the heroin distribution conspiracy revealed by, among other things, the Wiretap, there is probable cause to believe that RAMON exercised dominion and control over the narcotics, paraphernalia, firearm and other contraband discovered in the RAMON Residence.

WHEREFORE, your deponent respectfully requests that the defendant RAMON SANABRIA, also known as "Junior," be dealt with according to law.

S/ Philip Keane

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PHILIP KEANE  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this  
16th day of January, 2019

S/ Roanne Mann

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THE HONORABLE ROANNE L. MANN  
CHIEF UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK